

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,
ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS,
ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA,
ex rel. ALEX DOE, Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PARENTHOOD SOUTH TEXAS,
INC., PLANNED PARENTHOOD
CAMERON COUNTY, INC.,
PLANNED PARENTHOOD SAN
ANTONIO, INC.,

Defendants.

Civil Action No. 2-21-CV-022-Z

**UNOPPOSED MOTION TO EXPEDITE BRIEFING ON STATE
OF TEXAS'S MOTION TO QUASH AND MOTION FOR
PROTECTIVE ORDER**

NOW COMES Plaintiff the State of Texas ("Texas" or "State") and
files this Unopposed Motion to Expedite Briefing on its Motion to Quash

and Motion for Protective Order. ECF No. 275. The parties have agreed on a briefing schedule as set forth below and in the proposed Order attached hereto. For the reasons set forth herein, Texas respectfully requests that this Court enter the proposed Order.

SUMMARY OF MOTION

Defendants noticed the depositions of Stuart Bowen and Dr. Ted Spears. Texas asserts that any information Mr. Bowen and Dr. Spears acquired in their respective capacities at the OIG is categorically protected from discovery by the Medicaid Investigative Privilege and has moved to quash their depositions. Tex. Hum. Res. Code §§ 531.102(k), 531.1021(g). On November 11, 2022, the parties met and conferred on this issue and agreement could not be reached. Consequently, a ruling from the Court on the State's Motion to Quash and for Protective Order is necessary.

If this unopposed motion for expedited briefing is granted, the parties have agreed that Defendants will file a response on or before Thursday, November 17, 2022, and Texas will file a reply on or before Monday, November 21, 2022.

CONCLUSION

Texas respectfully requests that the Court grant its Motion for Expedited Briefing and enter the proposed Order attached hereto that sets forth the parties' agreed briefing schedule.

Dated: November 11, 2022

Respectfully submitted,

KEN PAXTON

Attorney General of Texas

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/s/ Raymond Charles Winter

RAYMOND CHARLES WINTER

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**ATTORNEYS FOR STATE OF
TEXAS**

CERTIFICATE OF CONFERENCE

I certify that counsel for the State of Texas has conferred with counsel for Defendants. Defendants do not oppose this Motion for Expedited Briefing and have agreed to the briefing schedule in the proposed order, attached hereto.

/s/ Raymond C. Winter

RAYMOND C. WINTER

Chief, Civil Medicaid Fraud Division

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was filed electronically via CM/ECF on November 11, 2022, causing electronic service on all counsel of record.

/s/ Raymond C. Winter

RAYMOND C. WINTER

Chief, Civil Medicaid Fraud Division